



U.S. Department of Justice

*United States Attorney  
Eastern District of New York*

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271 Cadman Plaza East  
Brooklyn, New York 11201

October 7, 2011

**By Federal Express and ECF**

Mr. Gerald L. Shargel, Esq.  
Mr. Ross M. Kramer, Esq.  
Law Offices of Gerald L. Shargel  
570 Lexington Avenue, 45th Floor  
New York, New York 10022  
(212) 446-2323

Re: United States v. Mousa Khouli  
Criminal Docket No. 11-340 (ERK)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure the government hereby produces discovery with respect to the above-captioned case. This letter supplements the government's previous discovery letters. The government reiterates its request for reciprocal discovery.

As noted in the government's discovery letter dated October 4, 2011, the government turned over, among other items, two compact disks labeled KHOULI 3642 and KHOULI 3643 which contain e-mail records for the account "[windsorant@yahoo.com](mailto:windsorant@yahoo.com)" (the "Windsorant account"). Those compact disks contain the non-privileged material from that email account. By the instant letter, the government hereby turns over two additional compact disks, labeled MK 000000014 and MK 000000015, containing all of the emails for the Windsorant account, both privileged and non-privileged, that the government received from the service provider, Yahoo.com. The privileged emails contained on these two disks (MK 000000014 and MK 000000015) were viewed solely by undersigned counsel and agents who are members of a taint team. Apart from reviewing the Windsorant account for privilege, undersigned counsel and taint agents are not otherwise involved in the prosecution of the above-captioned matter.

If you have any questions or requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: \_\_\_\_\_/s/\_\_\_\_\_  
Licha M. Nyiendo  
Assistant U.S. Attorney  
(718) 254-6350

Enclosures

cc: Clerk of Court (ERK) (w/o enclosures)